



Winston H. Hickox  
Secretary for  
Environmental  
Protection

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201

May 28, 1999



Gray Davis  
Governor

Mr. Chuck Trombold  
General Manager  
Oil and Solvent Process Company  
1704 West First Street  
Azusa, California 91702-3202

Dear Mr. Trombold:

### **CLASS 1 PERMIT MODIFICATION FOR OWNERSHIP CHANGE FROM OIL AND SOLVENT PROCESS COMPANY TO AETS, L.L.C., EPA ID CAD 028 302 903**

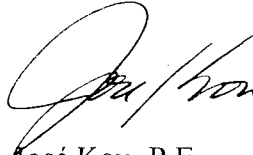
After review of the information you submitted with your letter of March 25, 1999 and by Ms. Melissa A. Manuel with her letter of May 3, 1999 on behalf of Oil and Solvent Process Company ("OSCO") and AETS, L.L.C., the Department of Toxic Substances Control ("DTSC"), in accordance with item A.7, Appendix I, Chapter 20, Division 4.5, Title 22, California Code of Regulations (22 CCR), approves your Class 1 Permit Modification request to transfer ownership and operational control of the above-captioned hazardous waste facility from OSCO to AETS, L.L.C. effective May 30, 1999. The facility name will remain as Oil and Solvent Process Company. Pursuant to 22 CCR, section 66270.40(b) you are required to submit a copy of the written agreement that contains the specific date for transfer of permit responsibility, coverage, and liability between the current and new permittees. Within 90 calendar days after the transfer of ownership, send a notice of the modification to all persons on the facility mailing list maintained by DTSC and specified state and local government agencies. See title 22, California Code of Regulations, section 66270.42. In addition, you are required to comply with DTSC regulations concerning financial assurance and liability insurance within six months of the date of the change of ownership and operational control of the facility.

Approval of the request to transfer ownership from OSCO to AETS, L.L.C. was granted by DTSC based on the representations made, and information submitted, by you and Ms. Manuel. DTSC will modify its database to reflect the change. Enclosed as Attachment "A" is a revised cover page of your hazardous waste facility permit. Please attach this page to the permit.

Trombold  
May 28, 1999  
Page 2

If you have any questions about this letter, please contact Andy Bajwa of my staff at 818-551-2911.

Sincerely ,



José Kou, P.E.  
Chief  
Southern California Permitting Branch

Certified Mail Receipt  
#Z 465 873 383

cc: Mrs. Florence Gharibian  
Statewide Compliance  
Department of Toxic Substances Control  
1011 N. Grandview Avenue  
Glendale, CA. 91201

Mr. Arturo Arreola  
South Coast Air Quality Management District  
21865 E. Copley Drive  
P. O. Box 4944  
Diamond Bar, CA. 91765

Director  
City of Los Angeles Bureau of Sanitation  
4590 Colorado Boulevard  
Los Angeles, CA. 90139

Mr. Juan Gutierrez  
Department of Toxic Substances Control  
P. O. Box 806  
Sacramento, CA. 95827

Trombold  
May 28, 1999  
Page 3

cc: AETS L,L.C  
1001 Fannin Street, Suite #400  
Houston, Texas 77002

Mrs. Melissa Manuel  
Holleb and Coff  
55 East Monroe Street, Suite 4100  
Chicago, Illinois 60603-5896

Mr. Kevin Wong  
U.S. EPA Region IX  
75 Hawthorne Boulevard  
San Francisco, CA. 94105



*California Environmental Protection Agency  
Department of Toxic Substances Control*

**HAZARDOUS WASTE FACILITY  
CLASS 1 PERMIT MODIFICATION NO. 22**

Facility: *Oil and Solvent Process Company  
1704 West First Street  
Azusa, California 91702-3203*

Owner: *AETS, L.L.C.  
1001 Fannin Street, Suite #4000  
Houston, Texas 77002*

Operator: *AETS, L, L.C.  
1001 Fannin Street, Suite #4000  
Houston, Texas 77002*

EPA ID Number: CAD 008302903

Modification Effective

Date: May 30, 1999

Permit Effective

Date: December 29, 1989

Expiration Date: Permit Renewal  
Application  
Determination

Pursuant to Section 25200 of the California Health and Safety Code, this Modified Hazardous Waste Facility Permit is hereby issued to: *AETS, L, L.C.*

The Issuance of this Modified Permit is subject to the conditions set forth in Attachment A which consists of 132 pages.

Jose Kou, P.E., Chief

*Southern California*

*Permitting Branch*

Department of Toxic Substances Control

Date: May 28, 1999



## Department of Toxic Substances Control



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201

June 7, 1999

Gray Davis  
Governor

### **CERTIFIED MAIL**

Mr. Royal W. Johnson  
Vice President, AETS, L.L.C.  
720 East Butterfield Road  
Lombard, Illinois 60148

Dear Mr. Johnson:

**CLASS 1 PERMIT MODIFICATION OF OWNERSHIP AND OPERATOR CHANGE  
OIL AND SOLVENT PROCESS COMPANY FACILITY, 107 SOUTH MOTOR  
AVENUE a/k/a 1704 WEST FIRST STREET, AZUSA, CA 91702-3202, EPA ID CAD 028  
302 903**

On May 28, 1999, the Department of Toxic Substances Control (DTSC) wrote a letter to Mr. Chuck Trombold, General Manager, Oil and Solvent Process Company (OSCO), informing him that DTSC had approved a Class 1 Permit Modification request to transfer ownership and operational control of the above-captioned hazardous waste facility from OSCO to AETS, L.L.C. A copy of the May 28, 1999 letter is enclosed. DTSC also instructed Mr. Trombold to comply with DTSC regulatory requirements concerning the transfer of a hazardous waste facility.

Although a copy of the May 28, 1999 letter was sent to AETS, L.L.C., the letter should have been addressed to AETS, L.L.C., as the new permittee. Consequently, this letter is to advise AETS, L.L.C. of DTSC action on the request to transfer ownership and operational control of the above-captioned hazardous waste facility, and of its responsibilities as the new permittee.

After review of the information submitted by Mr. Chuck Trombold with his letter of March 25, 1999, and the information submitted by Ms. Melissa A. Manuel, attorney for Waste Management, Inc., in her letter of May 3, 1999, DTSC approved the Class 1 Permit Modification request to transfer ownership and operational control of the above-captioned hazardous waste facility from OSCO to AETS, L.L.C. effective May 30, 1999. DTSC has been informed that the facility name will continue to be Oil and Solvent Process Company. Pursuant to DTSC regulations, AETS, L.L.C. is required to submit a copy of the written agreement that contains the specific date for transfer of permit responsibility, coverage, and liability between the prior and new permittee. See Title 22, California Code of Regulations (22CCR), Section 66270.40. In addition, AETS, L.L.C. is required to comply with DTSC regulations concerning financial assurance and liability insurance.

Johnson  
June 7, 1999  
Page 2

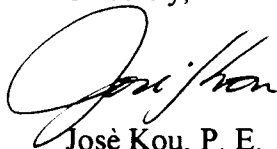
AETS, L.L.C. has already complied with the public notice requirements specified in 22 CCR, Section 66264.42 and no further public notice is necessary. DTSC would also like to obtain a copy of the articles of incorporation for AETS, L.L.C. for its file, and the name, title and address of a corporate officer who may be contacted on behalf of AETS, L.L.C. in the future.

Approval of the request to transfer ownership and operational control from OSCO to AETS, L.L.C. was granted by DTSC based on the representations made, and information submitted, by AETS, L.L.C., OSCO and Waste Management, Inc.

DTSC has been advised that AETS, L.L.C. has changed its name to Onyx Environmental Services, L.L.C. If this correct, AETS, L.L.C. should submit a request to modify its permit to reflect the name change.

Please contact Mr. Allan Plaza of my staff at (818) 551-2922 if you have any questions.

Sincerely,



José Kou, P. E.

Chief

Southern California Permitting Branch

Certified Mail Receipt  
#Z 465 873 792

cc: See next page

Johnson  
June 7, 1999  
Page 3

cc: Mrs. Florence Gharibian, Chief  
Statewide Compliance Branch  
Department of Toxic Substances Control  
1011 N. Grandview Avenue  
Glendale, CA 91201

Mr. Juan Gutierrez  
Department of Toxic Substances Control  
P. O. Box 806  
Sacramento, CA 95827

AETS, L.L.C.  
1001 Fannin Street, Suite #400  
Houston, Texas 77002

Mrs. Melissa Manuel  
Holleb and Coff  
55 East Monroe Street, Suite 4100  
Chicago, Illinois 60603-5896

Mr. Kevin Wong  
U. S. EPA Region IX  
75 Hawthorne Boulevard  
San Francisco, CA 94105

Mr. Chuck Trombold  
General Manager  
Oil and Solvent Process Company  
1709 West First Street  
Azusa, CA 91702



# Department of Toxic Substances Control



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201

Gray Davis  
Governor

September 7, 1999

Mr. Thomas G. Bramlette  
President, C.E.O.  
ONYX Environmental Services, L.L.C.  
107 South Motor Avenue  
Azusa, California 91702

Dear Mr. Bramlette:

**CLASS 1 PERMIT MODIFICATION NO. 23 FOR FACILITY NAME CHANGE FROM  
AETS L.L.C. TO ONYX ENVIRONMENTAL SERVICES L.L.C., LOCATED AT 1704  
WEST FIRST STREET, AZUSA, EPA ID NO. CAD 008 302 903**

The Department of Toxic Substances Control (DTSC) is in receipt of your Class 1 permit modification letter dated August 23, 1999 requesting to change the facility owner and operator's name from AETS L.L.C. to ONYX Environmental Services L.L.C., and also to change the facility name from Oil and Solvent Process Company (OSCO) to ONYX Environmental Services L.L.C. The facility was formerly known as Oil and Solvent Company (OSCO) d.b.a. Chemical Waste Management Inc. Azusa facility. Also included in your request was a letter from you authorizing certain positions in the company to sign documents or reports submitted to DTSC.

DTSC has reviewed the information and based on this information concurs that the proposed modification is only a name change, and this change will not affect the ownership or operational control of the facility or any conditions of the operating permit and, thus, is administrative in nature. Pursuant to section 66270.42 Appendix I(A)(1) of Title 22, California Code of Regulations (22CCR), this permit modification falls into the category of modifications which does not require DTSC's prior approval to implement the permit modification. This letter merely acknowledges the receipt of this notification for the facility name change.

Pursuant to 22 CCR, section 66270.42(a)(b), you are required to notify everyone on the facility mailing list within 90 days from the effective date of the modification. If this notice has already been sent, please provide a copy of this notice to this office within 15 days of this letter.

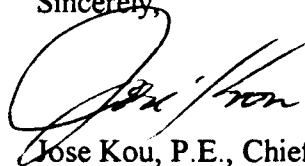


Mr. Thomas G. Bramlette  
September 7, 1999  
Page 2

Finally, in the future , please address all your permit modification requests to my attention at the letterhead address. Other requests can be addressed to Mr. Allan Plaza P.E., Unit Chief, Southern California Permitting Branch at the letterhead address.

If you have questions about this letter, please contact Andy Bajwa of my staff at (818) 551-2911.

Sincerely,

A handwritten signature in black ink, appearing to read "Jose Kou", written over the printed name.

Jose Kou, P.E., Chief  
Southern California Permitting Branch

cc:

ONYX Environmental Services L.L.C.  
3225 Aviation Ave., 4th Floor  
Miami, Florida 33133

Mr. John Schwind  
ONYX Environmental Services L.L.C.  
1704 West First Street  
Azusa, California 91702-3203

Mr. Kevin Wong  
U.S. EPA Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Wayne Praskins  
US EPA Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Thomas G. Bramlette  
September 7, 1999  
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Mr. Juan Gutierrez  
Department of Toxic Substances Control  
P.O. BOX 806  
Sacramento, CA 95812-0806

Ms. Kimberly Bolander  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 91765-4182

Mr. James Odling  
Hazardous Material Specialist 2  
County of Los Angeles Fire Department  
5825 Rickenbacker Street  
Commerce, CA 90040

Olga Bruno, CEM  
Police Dept., City Of Azusa  
725 N. Alameda Ave  
Azusa, California 90702

J.T. Liu  
Regional Water Quality Control Board Los Angeles Region  
300 West 4th Street, Suite 200  
Los Angeles, CA 90013

Department of Toxic Substance Control  
Mr. Steven Cain  
Public Participation Specialist  
1011 N. Grandview Avenue  
Glendale, CA 91201

Florence Gharibian, Chief  
Statewide Compliance Branch  
Southern California Region  
1011 N. Grandview Avenue  
Glendale, CA 91201

Mr. Thomas G. Bramlette  
September 7, 1999  
Page 4

Satish Gulati  
Statewide Compliance  
Department of Toxic Substances Control  
1011 N. Grandview Avenue  
Glendale, California 91201

Jone Barrio  
File Room  
Department of Toxic Substances Control  
1011 N. Grandview Avenue  
Glendale, California 91201



*California Environmental Protection Agency  
Department of Toxic Substances Control*

**HAZARDOUS WASTE FACILITY  
CLASS 1 PERMIT MODIFICATION NO. 23**

Facility: *ONYX Environmental Services L.L.C.  
1704 West First Street  
Azusa, California 91702-3203*

Operator: *ONYX Environmental Services L.L.C.  
3225 Aviation Avenue, 4th Floor  
Miami, Florida 33133*

Owner: *ONYX Environmental Services L.L.C.  
3225 Aviation Avenue, 4th Floor  
Miami, Florida 33133*

EPA ID Number: CAD 008302903

Modification Effective  
Date: September 7, 1999

Permit Effective  
Date: December 29, 1989

Expiration Date: Permit Renewal  
Application  
Determination

Pursuant to Section 25200 of the California Health and Safety Code, this modified Hazardous Waste Facility Permit is hereby issued to ONYX Environmental Services L.L.C.

The issuance of this modified Permit is subject to the other conditions set forth in Attachment A which consists of 132 pages. .

José Kou, P.E., Chief  
Southern California Permitting Branch

Date: September 7, 1999



October 31, 1997

COPY



ID

Cal/EPA

Department of  
Toxic Substances  
Control

1011 N. Grandview Ave.  
Glendale, CA 91201

Ms. Lori T. Tagawa, P.G.  
Remedial Project Manager  
Waste Management, Inc.  
3900 South Wadsworth Blvd., Suite 800  
Lakewood, CO 80235

Pete Wilson  
Governor

Peter M. Rooney  
Secretary  
for Environmental  
Protection

Dear Ms. Tagawa:

**OIL AND SOLVENT PROCESS COMPANY, AZUSA, SOIL VAPOR EXTRACTION  
PILOT STUDY, EPA ID NUMBER CAD 008 302 903**

The Department of Toxic Substances Control (DTSC) has reviewed your draft Final Workplan dated August 1997, which was submitted by OHM Remediation Services Corp. The draft Workplan outlines the design of the five (5) vacuum extraction systems for conducting the pilot test study to collect volatile organic compounds (VOCs) from the vadose zone and to further characterize the extent of contamination at the site. The result of the pilot test study will be used to design the system to remediate VOCs from the vadose zone. On August 27, 1997, DTSC verbally approved the drilling of the soil vapor extraction well as proposed in the draft Final Workplan.

Attached are DTSC's comments on the draft Final Workplan. Please review the comments and incorporate your response with the response to DTSC's Notice of Deficiency dated May 1, 1996 for the RFI report.

If you have any question about these comments, please contact Craig Christmann at (818) 551-2929 or Andy Bajwa at (818) 551-2911.

Sincerely,

Allan Plaza, P.E.  
Unit Chief  
Southern California  
Permitting Branch

Enclosure

cc: See next page

Ms. Lori T. Tagawa  
October 31, 1997  
Page 2

cc: Mr. Sandeep Davankar  
Mr. Guy Berger  
OHM Remediation Services Corp.  
2031 Main Street  
Irvine, California 92614-6509

Mr. Wayne Kiso  
Chemical Waste Management, Inc.  
1704 West First Street  
Azusa, California 91702

Ms. Mary Blevins  
Mr. Wayne Praskins  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Wayne Chu  
Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

STATE OF CALIFORNIA — CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE  
GLENDALE, CA 91201  
(818) 551-2800

## FAX TRANSMITTAL

TO: MARY BLEVINS DATE SENT: 6/01/95  
NAME OF COMPANY: US EPA  
FAX #: 9-415-744-1099 TELEPHONE #: 9-415-744-2069  
TOTAL PAGES (Including Cover Page): \_\_\_\_\_ pages

FROM: ANDY BATWA  
FAX #: (818) 551-2874 TELEPHONE #: 9 818-551-2911

<input type="checkbox"/> Information	<input type="checkbox"/> Per your request
<input type="checkbox"/> Confidential Document(s)	<input type="checkbox"/> URGENT
<input checked="" type="checkbox"/> Please Comment	<input type="checkbox"/> Please verify receipt of fax tel. #: _____

## COMMENTS:

OSCO MEETING AGENDA.  
PLEASE SHARE WITH WAYNE JACKSONS.

3106709512

MEREDITH/BOLI

F-293 T-123 P-002/003 JUN 01 '95 11:38

21

1 June 1995

-- VIA FACSIMILE --

Mr. Andy Bajwa  
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
Facility Permitting Branch  
1011 N. Grandview Avenue  
Glendale, California 91201

Re: Chemical Waste Management, Inc. -- Azusa, California Facility (CAD 008302903)

Dear Mr. Bajwa:

We accept your request to attend a meeting to be held at 1:00 pm, on 6 June 1995, in the Glendale offices of the Department of Toxic Substances Control (DTSC). In accordance with our recent conversation, we are providing a tentative agenda for the meeting. We understand that the meeting has been scheduled partly in response to issues contained in the 2 March 1995 letter from the DTSC to Chemical Waste Management (CWM), and the 28 April 1995 CWM response to that letter. As the result, the agenda focuses largely on those issues.

**TENTATIVE AGENDA -- 6 JUNE 1995**

**I. INDIVIDUAL INTRODUCTIONS**

- Mary Blevins, USEPA, Region IX, RCRA
- Wayne Praskins, USEPA, Region IX, Baldwin Park Operable Unit Project Manager
- Alan Plaza, DTSC, Facility Permitting Branch, Unit Manager
- Philip Chandler, DTSC, Supervising Engineering Geologist
- Andy Bajwa, DTSC, Facility Permitting Branch
- Craig Christmann, DTSC, Engineering Geologist
- Wayne Chiou, Regional Water Quality Control Board (RWQCB), Los Angeles Region
- Steve Richtel, Waste Management, Inc. (WMI), Lakewood, Colorado
- Marc Yalom, CWM, Fremont, California
- Wayne Kiso, CWM, Azusa, California
- Henry Kerfoot, Kerfoot and Associates



3106709512

MEREDITH/BOLI

F-293 T-123 P-003/003 JUN 01 '95 11:38

- Michael Meredith, Meredith/Boli & Associates (M/B&A)
- Ronald Cavagrotti, M/B&A
- Donn Marrin, M/B&A
- Tom Davis, M/B&A

## II. ISSUES OF THE 2 MARCH 1995 DTSC AND 28 APRIL 1995 CWM LETTERS

- ✓ • Status of the RCRA Facility Investigation (RFI) and DTSC/USEPA Reviews
- ✓ • Number of Site Wells Necessary for Groundwater Monitoring
- ✓ • Results of the Vadose Zone Investigation and VOC Vapor Migration Modeling

## III. AGENCY ROLES/INTERAGENCY MANAGEMENT

We would appreciate your distribution of this letter to the involved USEPA, DTSC, and RWQCB individuals. We will distribute the letter to the individuals copied below. Please do not hesitate to call the undersigned at (310) 670-9221 if you have questions or comments.

Sincerely,

Tom W. Davis, R.G.  
Project Scientist

cc: Steve Richtel, WMI  
Marc Yalom, CWM  
Wayne Kiao, CWM  
Henry Kerfoot, Kerfoot and Associates  
Michael Meredith, M/B&A  
Ronald Cavagrotti, M/B&A  
Donn Marrin, M/B&A

:twc

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

(818) 567-3000



January 27, 1992

## CERTIFIED MAIL

Mr. William Mitzel, General Manager  
Oil & Solvent Process Company (OSCO)  
1704 W. First Street  
Azusa, California 91702

Dear Mr. Mitzel:

## REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On October 28, 29, 30, and December 16, 1991, representatives of the Department of Toxic Substances Control conducted inspections of OSCO located at 1704 W. First Street, Azusa, 91702 (CAD008302903).

As a result of these inspections, violations of hazardous waste statutes and regulations were identified.

Specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in DHS citing you for continuing/additional violations.

I. Schedule of Violations

- COUNT 1. Title 22, California Code of Regulations, Section 66264.173  
(a) (previously section 67243 (a)).

Cardboard containers stored in the Hazardous Waste Storage Area were not securely closed.

II. Schedule for Correction

Correct all violations upon receipt of this Report.

Please submit written verification to this office by February 19, 1992, that the above violation(s) have been corrected.

All submittals to the Department, as requested above, must contain the signed certification as required by Section 66270.11, Title 22, California Code of Regulations.

The Department will conduct a reinspection of OSCO to verify compliance.

The issuance of this Report Of Violation and Schedule of Compliance does not preclude DHS from taking administrative, civil, or criminal action as a result of the violations noted herein.

Mr. William Mitzel  
January 27, 1992  
Page 2

If you have any questions regarding this report, please contact Jerry Lile at  
(818) 567-3052.

Sincerely,

*Mahe Richey, for*

Scott Simpson  
Branch Chief  
Facilities Management Branch

Certified Mail  
P 565 319 373  
(Return Receipt Requested)

cc: Mr. James R. Cutright  
Acting Chief Counsel  
Toxics Legal Office  
California Environmental Protection Agency  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Ms. Mary Locke, Chief  
Office of Local Enforcement  
California Environmental Protection Agency  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. Don Johnson, Chief  
HQ's Surveillance and Enforcement  
California Environmental Protection Agency  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. Anastacio Medina, Chief  
Hazardous Waste Control Program  
Los Angeles County Fire Department  
2615 South Grand Avenue, Room 607  
Los Angeles, California 90007

Mr. William Mitzel

January 27, 1992

Page 3

cc: Ms. Maria Kelly ✓  
Waste Compliance Branch  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street (W-42)  
San Francisco, California 94105

Mr. Robert Ghirelli  
Executive Director  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

Ms. Theodora Berger  
Assistant Attorney General  
Environmental Law Section  
Department of Justice  
300 South Spring Street  
North Tower, 11th Floor  
Los Angeles, California 90013

## DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

(818) 567-3000



June 20, 1991

## CERTIFIED MAIL

C T Corporation System  
818 West Seventh Street  
Los Angeles, CA 90017

Agent for Service of Process for:

Oil & Solvent Process Company  
1704 West First Street  
Azusa, CA 91702

Dear Sir:

IN THE MATTER: CORRECTIVE ACTION ORDER AND COMPLAINT FOR PENALTY, OIL & SOLVENT PROCESS COMPANY, DOCKET HWCA 90/91 - 051.

Enclosed please find a Corrective Action Order and Complaint for Penalty, and related documents concerning violations of Chapter 6.5 of the California Health and Safety Code and Title 22 of the California Code of Regulations by Oil & Solvent Process Company located at 1704 West First Street in Azusa, California 91702.

As indicated in the enclosures, you have the right to a hearing. Whether or not you choose to pursue an appeal, you are encouraged to explore the possibility of settlement by contacting Robert Kou at the above address or (818) 567-3021.

Sincerely,

Dennis A. Dickerson  
Regional Administrator

Enclosures

Certified Mail

84709

(Return Receipt Requested)

cc: Mr. R. David McConnell  
Regional Organics Manager  
Oil & Solvent Process Company  
1704 West First Street  
Azusa, CA 91702

STATE OF CALIFORNIA  
HEALTH AND WELFARE AGENCY  
DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of: ) Docket HWCA 90/91 - 051  
)  
) STATEMENT TO RESPONDENT  
Oil & Solvent Process Company )  
1704 West First Street ) (Corrective Action Order and  
Azusa, CA 91702 ) Complaint for Penalty)  
EPA ID No. CAD008302903 )  
)  
Respondent. )

TO THE ABOVE RESPONDENT:

A Corrective Action Order and/or Complaint for Penalty (Order/Complaint) is attached to this statement and is hereby served upon you. The Order/Complaint has been filed by the Department of Health Services (Department).

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the Department within ten days after you received a copy of the Order/Complaint, you will be deemed to have waived your right to a hearing in this matter. If you do not file a timely hearing request, the Corrective Action Order becomes final automatically and the Department will issue an Order Setting Penalty, which will set the penalty in the amount proposed in the Complaint for Penalty.

The request for a hearing may be made by delivering or mailing one copy of the enclosed form entitled "Notice of Defense" or by delivering or mailing a Notice of Defense as provided in section 11506 of the Government Code to:

1 William F. Soo Hoo  
2 Assistant Chief Counsel  
3 Toxic Legal Office  
4 Toxic Substances Control Program  
5 714/744 P Street  
6 P. O. Box 942732  
7 Sacramento, CA 94234-7320

8 The enclosed Notice of Defense, if signed and filed  
9 with the Department, is deemed a specific denial of all parts of  
10 the Order/Complaint, but you will not be permitted to raise any  
11 objection to the form of the Order/Complaint unless you file a  
12 further Notice of Defense as provided in section 11506 of the  
13 Government Code within ten days after service of the  
14 Order/Complaint upon you.

15 If you file a Notice of Defense within the time  
16 permitted, a hearing on the allegations made in the  
17 Order/Complaint will be conducted by the Office of Administrative  
18 Hearings of the Department of General Services in accordance with  
19 the procedures specified in Health and Safety Code sections 25187  
20 and/or 25189.3 and Government Code sections 11507 - 11517.

21 The hearing may be postponed for good cause. If you  
22 have good cause, you must notify the Department within ten  
23 working days after you discover the good cause. Failure to  
24 notify the Department within ten days will deprive you of a  
25 postponement.

26 Copies of sections 11507.5, 11507.6, and 11507.7 of the  
27 Government Code are attached. If you desire the names and  
addresses of witnesses or an opportunity to inspect and copy  
items in possession, custody, or control of the Department,  
you may contact:

1 William F. Soo Hoo  
2 Assistant Chief Counsel  
3 Toxic Legal Office  
4 Toxic Substances Control Program  
5 714/744 P Street  
6 P. O. Box 942732  
7 Sacramento, Ca 94234-7320

8 Whether or not you have a hearing, you may confer  
9 informally with the Department to discuss the alleged facts,  
10 determinations, and corrective actions. An informal conference  
11 does not, however, postpone the ten-day period you have to  
12 request a hearing on the Order/Complaint. An informal conference  
13 may be pursued simultaneously with the hearing process.

14 You may but are not required to be represented by  
15 counsel at any or all stages of these proceedings.  
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STATE OF CALIFORNIA  
HEALTH AND WELFARE AGENCY  
DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of: ) Docket HWCA 90/91 - 051  
Oil & Solvent Process Company )  
1704 West First Street ) CORRECTIVE ACTION ORDER AND  
Azusa, CA 91702 ) COMPLAINT FOR PENALTY  
EPA ID No. CAD008302903 )  
Respondent. ) Health and Safety Code  
Sections 25187 and 25189.2

INTRODUCTION

1.1. Parties. The State Department of Health Services (Department) issues this Corrective Action Order and Complaint for Penalty (Order and Complaint) to Oil & Solvent Process Company, a California corporation (Respondent).

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous waste at the following site: 1704 West First Street, Azusa, California 91702 (Site). (Map attached as Exhibit 1.)

1.3. Permit/Interim Status. The Department authorized Respondent to manage hazardous waste by United States Environmental Protection Agency Hazardous Waste Facility Permit Number CAD008302903 issued on August 19, 1983, and renewed on November 29, 1989, by Hazardous Waste Facility Permit No. 89-3-TS-001.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to issue an Order when the Department determines that any person has violated, is violating,

1 or threatens to violate specified provisions of the Health and  
2 Safety Code or any permit, rule, regulation, standard, or  
3 requirement issued or adopted pursuant thereto. HSC section  
4 25189.2 authorizes the Department to issue a Complaint and to  
5 impose a penalty on persons who commit specified acts, pursuant  
6 to the procedures set forth in HSC section 25189.3.

7 1.5. Exhibits. All exhibits attached to this Order and  
8 Complaint are incorporated herein by this reference.

9 DETERMINATION OF VIOLATIONS

10 2. The Department has determined that the Respondent has  
11 violated, is violating, or threatens to violate HSC section  
12 25189.2 and other specified provisions as follows:

13 2.1. Respondent violated Title 22, California Code of  
14 Regulations (Cal. Code Regs.), section 66541(b), in that on or  
15 about October 31, 1990, Respondent, who was the transporter of  
16 the hazardous waste, did not complete the date on the Transporter  
17 of Waste section on two (2) separate hazardous waste manifests.

18 2.2. Respondent violated Title 22, Cal. Code Regs., section  
19 66824(a)(5), in that on or about November 27, 1990, Respondent  
20 stored in a non-permitted storage area laboratory samples of  
21 hazardous waste over 90 days after testing and before returning  
22 the samples to the sample collector, to wit: Respondent stored  
23 240 laboratory samples in their laboratory samples storage area  
24 in excess of 90 days after testing and before returning the  
25 samples to the collector or properly disposing them.

26 2.3. Respondent violated Title 22, Cal. Code Regs., section  
27 67105(a)(3), in that on or about November 27, 1990, Respondent's

1 training program was not designed to ensure that facility  
2 personnel are able to respond effectively to emergencies by  
3 familiarizing them with the emergency procedures, emergency  
4 equipment, and emergency systems, to wit: personnel were not  
5 familiar with proper emergency equipment and procedures in the  
6 event of a spill of certain wastes handles at the facility.

7 2.4. Respondent violated Title 22, Cal. Code Regs., section  
8 67120(a), in that on or about November 26, 27 and 29, 1990,  
9 Respondent did not maintain and operate its facility to minimize  
10 the possibility of an unplanned, sudden, or non-sudden release of  
11 hazardous waste or hazardous waste constituents to the air, soil,  
12 or surface water which could threaten human health or the  
13 environment, to wit: Respondent stored a 55-gallon drum whose  
14 content was dripping on the side of the drum and onto the surface  
15 of the drum storage area.

16 2.5. Respondent violated Title 22, Cal. Code Regs., section  
17 67241, and Permit # 89-3-TS-001, Attachment A, section IV.D., in  
18 that on or about November 26, 27 and 29, 1990, Respondent stored  
19 hazardous waste in containers which were not in good condition,  
20 and Respondent did not transfer the waste from these containers  
21 to containers that were in good condition, to wit: two (2)  
22 55-gallon drums containing hazardous waste which leaked were  
23 stored in the drum storage area. Additionally, Respondent stored  
24 a bulging 55-gallon drum containing hazardous waste in the drum  
25 storage area.

26 2.6. Respondent violated Title 22, Cal. Code Regs., section  
27 67243(a), and Permit # 89-3-TS-001, Attachment A, section IV.F.1,

1 in that on or about November 26, 27 and 29, 1990, Respondent  
2 stored hazardous waste in open containers at a time when wastes  
3 were not being added or removed, to wit: a 55-gallon drum  
4 containing hazardous waste with a punctured top was stored in the  
5 drum storage area.

6 2.7. Respondent violated Permit # 89-3-TS-001, Attachment  
7 A, section IV.F.3.e, in that on or about November 26, 27 and 29,  
8 1990, Respondent stored hazardous waste in a container which was  
9 not labelled with the information required in the permit, to wit:  
10 a 55-gallon drum containing hazardous waste received by  
11 Respondent was not labelled as such ("Hazardous Waste") and did  
12 not identify the date of acceptance at the facility.

13 SCHEDULE FOR COMPLIANCE

14 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT  
15 IS HEREBY ORDERED THAT:

16 3.1.1. Effective immediately, Respondent owned transporters  
17 shall complete the date on the Transporter of Waste section on  
18 the hazardous waste manifests.

19 3.1.2. Effective immediately, Respondent shall discontinue  
20 storing laboratory samples in their laboratory samples storage  
21 area in excess of 90 days after testing prior to returning the  
22 samples to the collector or properly disposing them.

23 3.1.3. Within 30 days of the effective date of this Order,  
24 Respondent shall modify its training program to fully comply with  
25 the requirements of Title 22, Cal. Code Regs., section  
26 67105(a)(3).  
27

1 3.1.4. Effective immediately, Respondent shall maintain and  
2 operate its facility to minimize the possibility of an unplanned,  
3 sudden, or non-sudden release of hazardous waste or hazardous  
4 waste constituents to the air, soil, or surface water which could  
5 threaten human health or the environment.

6 3.1.5. Effective immediately, Respondent shall discontinue  
7 the practice of storing hazardous waste in containers which are  
8 leaking, bulging or otherwise not in good condition.

9 3.1.6. Effective immediately, Respondent shall store all  
10 containers holding hazardous waste closed.

11 3.1.7. Effective immediately, Respondent shall label as  
12 "Hazardous Waste" containers and shall identify the date of  
13 acceptance at the facility all containers holding hazardous waste  
14 received by Respondent.

15 3.2. Submittals. All submittals from a Respondent pursuant  
16 to this Order shall be sent simultaneously to:

17 • Dennis A. Dickerson, Regional Administrator  
18 Region 3 (Burbank)  
19 • Toxic Substances Control Program  
20 Department of Health Services  
1405 N. San Fernando Blvd., Suite 300  
Burbank, CA 91504

21 Robert P. Ghirelli, Executive Officer  
22 Regional Water Quality Control Board  
23 Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, CA 91754-2156

24 Anastacio Medina, Chief  
25 Hazardous Materials Control Program  
26 Los Angeles County  
27 Department of Health Services  
2615 South Grand Ave., 6th Floor  
Los Angeles, CA 90007

1 3.3. Communications. All approvals and decisions of the  
2 Department made regarding submittals and notifications will be  
3 communicated to Respondent in writing by a Section Chief, Toxic  
4 Substances Control Division, Department of Health Services, or  
5 his/her designee. No informal advice, guidance, suggestions, or  
6 comments by the Department regarding reports, plans,  
7 specifications, schedules, or any other writings by Respondent  
8 shall be construed to relieve Respondent of the obligation to  
9 obtain such formal approvals as may be required.

10 3.4. Department Review and Approval. If the Department  
11 determines that any report, plan, schedule, or other document  
12 submitted for approval pursuant to this Order fails to comply  
13 with the Corrective Action Order or fails to protect public  
14 health or safety or the environment, the Department may:

15 a. Modify the document as deemed necessary and approve  
16 the document as modified or

17 b. Return the document to Respondent with recommended  
18 changes and a date by which Respondent must submit to the  
19 Department a revised document incorporating the recommended  
20 changes.

1 3.5. Compliance with Applicable Laws: Respondent shall  
2 carry out this Order in compliance with all local, State, and  
3 federal requirements, including but not limited to requirements  
4 to obtain permits and to assure worker safety.

5 3.6. Endangerment during Implementation: In the event that  
6 the Department determines that any circumstances or activity  
(whether or not pursued in compliance with this Order) are

1 creating an imminent or substantial endangerment to the health or  
2 welfare of people on the site or in the surrounding area or to  
3 the environment, the Department may order Respondent to stop  
4 further implementation of this Order for such period of time as  
5 needed to abate the endangerment. Any deadline in this Order  
6 directly affected by a Stop Work Order under this section shall  
7 be extended for the term of the Stop Work Order.

8 3.7. Liability: Nothing in this Order shall constitute or  
9 be construed as a satisfaction or release from liability for any  
10 conditions or claims arising as a result of past, current, or  
11 future operations of Respondent. Notwithstanding compliance with  
12 the terms of this Order, Respondent may be required to take  
13 further actions as are necessary to protect public health or  
14 welfare or the environment.

15 3.8. Site Access: Access to the site shall be provided at  
16 all reasonable times to employees, contractors, and consultants  
17 of the Department, and any agency having jurisdiction. Nothing  
18 in this Order is intended to limit in any way the right of entry  
19 or inspection that any agency may otherwise have by operation of  
20 any law. The Department and its authorized representatives shall  
21 have the authority to enter and move freely about all property at  
22 the Site at all reasonable times for purposes including but not  
23 limited to: inspecting records, operating logs, and contracts  
24 relating to the Site; reviewing the progress of Respondent in  
25 carrying out the terms of this Order; and conducting such tests  
26 as the Department may deem necessary. Respondent shall permit  
27 such persons to inspect and copy all records, documents, and

1 other writings, including all sampling and monitoring data, in  
2 any way pertaining to work undertaken pursuant to this Order.

3 3.9. Sampling, Data, and Document Availability. Respondent  
4 shall permit the Department and its authorized representatives to  
5 inspect and copy all sampling, testing, monitoring, and other  
6 data generated by Respondent or on Respondent's behalf in any way  
7 pertaining to work undertaken pursuant to this Order. Respondent  
8 shall allow the Department and its authorized representatives to  
9 take duplicates of any samples collected by Respondent pursuant  
10 to this Order. Respondent shall maintain a central depository of  
11 the data, reports, and other documents prepared pursuant to this  
12 Order. All such data, reports, and other documents shall be  
13 preserved by Respondent for a minimum of six years after the  
14 conclusion of all activities under this Order. If the Department  
15 requests that some or all of these documents be preserved for a  
16 longer period of time, Respondent shall either comply with that  
17 request, deliver the documents to the Department, or permit the  
18 Department to copy the documents prior to destruction.  
19 Respondent shall notify the Department in writing at least six  
20 months prior to destroying any documents prepared pursuant to  
21 this Order.

22 3.10. Government Liabilities: The State of California  
23 shall not be liable for injuries or damages to persons or  
24 property resulting from acts or omissions by Respondent or  
25 related parties specified in paragraph 3.16 in carrying out  
26 activities pursuant to this Order, nor shall the State of  
27 California be held as a party to any contract entered into by



Respondent or its agents in carrying out activities pursuant to the Order.

3.11. Additional Enforcement Actions: By issuance of this Order, the Department does not waive the right to take further enforcement actions.

3.12. Incorporation of Plans and Reports. All plans, schedules, and reports that require Department approval and are submitted by Respondent pursuant to this Order are incorporated in this Order upon approval by the Department.

3.13. Extension Request: If Respondent is unable to perform any activity or submit any document within the time required under this Order, the Respondent may, prior to expiration of the time, request an extension of time in writing. The extension request shall include a justification for the delay.

3.14. Extension Approvals: If the Department determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule.

3.15. Penalties for Noncompliance: Failure to comply with the terms of this Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by HSC section 25188 and other applicable provisions of law.

3.16. Parties Bound: This Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees,

1 successors, and assignees, including but not limited to  
2 individuals, partners, and subsidiary and parent corporations,  
3 and upon any successor agency of the State of California that may  
4 have responsibility for and jurisdiction over the subject matter  
5 of this Order.

6 PENALTY

7 4. Based on the foregoing DETERMINATION OF VIOLATIONS, the  
8 Department sets the amount of Respondent's total proposed penalty  
9 at \$ 41,400.

10 RIGHT TO A HEARING

11 5. You may request a hearing to challenge the Order and  
12 Complaint. Appeal procedures are described in the attached  
13 Statement to Respondent.

14 EFFECTIVE DATE

15 6.1. This Order and Complaint is final and effective ten  
16 days from the date it is served on you, unless you request a  
17 hearing within the ten-day period.

18 TIME PERIODS

19 7. "Days" for purposes of this Order and Complaint means  
20 calendar days.

21 Date of Issuance June 19, 1991.

22  
23  
24 Dennis A. Dickerson  
25 Dennis A. Dickerson  
26 Regional Administrator  
27 Region 3 (Burbank)  
Toxic Substances Control Program  
Department of Health Services

1 bcc: Mr. William Soo Hoo  
2 Assistant Chief Counsel  
3 Toxics Legal Office  
4 Toxic Substances Control Program  
714/744 "P" Street  
Sacramento, CA 94234-7320

5 Mr. Gary Lance  
6 Waste Compliance Branch (H-4-1)  
7 U. S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

8 Mr. Val Siebal  
9 Regional Administrator  
10 Region 1 (Sacramento)  
11 Toxic Substances Control Program  
10151 Croydon Way  
Sacramento, CA 95827

12 Mr. Howard Hatayama  
13 Regional Administrator  
14 Region 2 (Emeryville)  
Toxic Substances Control Program  
2151 Berkeley Way, Annex 7  
Berkeley, CA 94704

15 Mr. John Hinton  
16 Regional Administrator  
17 Region 4 (Long Beach)  
18 Toxic Substances Control Program  
245 West Broadway, Suite 350  
Long Beach, CA 90802

19 Mr. Don Johnson, Chief  
20 HQ's Surveillance and Enforcement Unit  
21 Toxic Substances Control Program  
714/744 "P" Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

22 Ms. Mary Locke, Chief  
23 Office of Local Enforcement  
24 Toxic Substances Control Program  
25 714/744 "P" Street  
26 P.O. Box 942732  
27 Sacramento, CA 94234-7320

1 bcc: Mr. Anastacio Medina, Chief  
2 Hazardous Waste Control Program  
3 Los Angeles County  
4 Department of Health Services  
5 2615 South Grand Avenue, 6th Floor  
6 Los Angeles, CA 90007

7 Mr. Robert P. Ghirelli  
8 Executive Officer  
9 California Regional Water Quality Control Board  
10 Los Angeles Region  
11 101 Center Plaza Drive  
12 Monterey Park, CA 91754-2156

13 Ms. Theodora Berger  
14 Assistant Attorney General  
15 Environmental Law Section  
16 Department of Justice  
17 • 3580 Wilshire Blvd. Suite 800  
18 Los Angeles, CA 90010  
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STATE OF CALIFORNIA  
HEALTH AND WELFARE AGENCY  
DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of: ) Docket HWCA 90/91 - 051  
)  
) NOTICE OF DEFENSE  
Oil & Solvent Process Company )  
1704 West First Street ) Health and Safety Code  
Azusa, CA 91702 ) Section 25187(c)  
EPA ID No. CAD008302903 )  
)  
Respondent. )

I, the undersigned Respondent, acknowledge receipt of a copy of the Corrective Action Order and/or Complaint for Penalty, Statement to Respondent, Government Code sections 11507.5, 11507.6, and 11507.7, and two copies of a Notice of Defense.

I request a hearing to permit me to present my defense to the allegations contained in the Corrective Action Order and/or Complaint for Penalty.

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Respondent)

Mailing Address of Respondent:

\_\_\_\_\_  
(Street Address)

\_\_\_\_\_  
(City) (State) (Zip)

\_\_\_\_\_  
(Telephone Number)

STATE OF CALIFORNIA  
HEALTH AND WELFARE AGENCY  
DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of: ) Docket HWCA 90/91 - 051  
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Dated: \_\_\_\_\_

\_\_\_\_\_  
(Respondent)

Mailing Address of Respondent:

\_\_\_\_\_  
(Street Address)

\_\_\_\_\_  
(City) (State) (Zip)

\_\_\_\_\_  
(Telephone Number)

CHEM WASTE MANAGEMENT TEL 510.14156567583

Feb 4, 91 17:22 No.011 P.02

FEB 4 1991 MON 15:08 ENSECO-CRL CARDGVPA P.02

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY

BERKELEY, CA 94704

(415)840-2800



September 4, 1990

Paul Christi  
Enseco-CRL/Mobile Lab.  
7440 Lincoln Way  
Garden Grove, CA 92641

Certificate No.: 1307

Dear Mr. Christi:

This is to advise you that the laboratory named above has been accredited and/or registered as an environmental laboratory pursuant to the provisions of the California Environmental Laboratory Improvement Act of 1988 (Health and Safety Code, Division 1, Part 2, Chapter 7.5, commencing with Section 1010).

The fields of testing for which this laboratory has been accredited and/or registered under this Act are indicated on the enclosed Environmental Laboratory Accreditation List. Accreditation and/or registration shall remain in effect until September 30, 1992, unless revoked, and is subject to payment of the fees prescribed by Section 1017(a), Health and Safety Code, on the anniversary date of the application.

The above is also subject to payment of any prescribed annual fees.

If you were notified of any deficiency after an on-site evaluation, your written plan of correction is on file. Your implementation of such corrections is subject to verification by the Department.

Your laboratory is required to participate in periodic proficiency testing. It is important that your laboratory strive to meet and exceed all minimum requirements. Your cooperation is essential in order to establish a reputation for the high quality of the data produced by environmental laboratories accredited by the State of California.

Your laboratory is required to notify the Environmental Laboratory Accreditation Program of major changes in the laboratory such as the transfer of ownership, change in location, or structural alterations which may affect adversely the quality of analyses (Section 1014(b), California Health & Safety Code).

CHEM WASTE MANAGEMENT TEL No. 14156567583

Feb 4.91 17:22 No.011 P.01

FEB- 4-91 MON 15:06 ENHCO-CRL GARDENVPA P.03

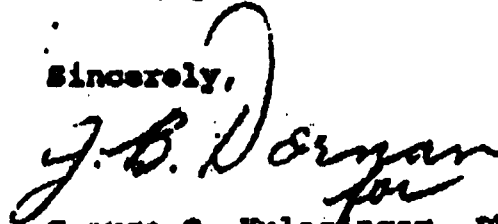
Mr. Paul Christi  
Page 2  
September 4, 1990

Until regulations are adopted under the Act, the existing regulations pertaining to drinking water and hazardous waste testing laboratories (California Code of Regulations, Title 22, Sections 64481-64499 and 67602-67606) will remain in effect to the extent that they are not superseded by the provisions of the Act.

A certificate of accreditation, instructions for renewal of accreditation and/or registration, and advice of statutory adjustments of the annual fee will be mailed to you as each becomes available.

If you have additional questions, please contact J. B. Dornan at (415) 540-2800.

Sincerely,



George C. Kulasingam, Ph.D., Manager  
Environmental Laboratory  
Accreditation Program

Enclosure



CHEM WASTE MANAGEMENT TEL No. 14156567583

Fe 4.91 17:22 No.011 P.03

FEB - 4 - 91 MON 10:07 ENSCO-CRL GARDEN GROVE P.04

ENVIRONMENTAL LABORATORY ACCREDITATION/REGISTRATION  
List of Approved Fields of Testing and Analytes

Enasco-CRL/Mobile Laboratory  
7440 Lincoln Way  
Garden Grove, CA 92641

PHONE: (714) 898-6370  
COUNTY: Orange  
Vehicle License No.: 3H23882

LABORATORY CATEGORY: Commercial  
CERTIFICATE NUMBER: 1207

Y = CERTIFIED; N = NOT CERTIFIED

1.0 Microbiology of Drinking Water and Wastewater -----	(-----)
1.1 Total Coliforms by Multiple Tube Fermentation -----N	1.3 Total coliforms by Membrane Filter -----N
1.2 Fecal Coliforms by Multiple Tube Fermentation -----N	1.4 Fecal coliforms by Membrane Filter -----N
	1.5 Heterotrophic Plate Count -----N
2.0 Inorganic Chemistry and Physical Properties of Drinking Water excluding Toxic Chemical Elements -----	(-----)
2.1 Alkalinity -----N	2.8 MBAS -----N
2.2 Calcium -----N	2.9 Nitrate -----N
2.3 Chloride -----N	2.10 Nitrite -----N
2.4 Corrosivity -----N	2.11 Sodium -----N
2.5 Fluoride -----N	2.12 Sulfate -----N
2.6 Hardness -----N	2.13 Total Filterable residue and Conductivity -----N
2.7 Magnesium -----N	
3.0 Analysis of Toxic Chemical Elements in Drinking Water -----	(-----)
3.1 Arsenic -----N	3.7 Lead -----N
3.2 Barium -----N	3.8 Manganese -----N
3.3 Cadmium -----N	3.9 Mercury -----N
3.4 Chromium, total -----N	3.10 Selenium -----N
3.5 Copper -----N	3.11 Silver -----N
3.6 Iron -----N	3.12 Zinc -----N
4.0 Organic Chemistry of Drinking Water (measurement by GC/MS combination) -----	(-----)
4.1 Volatile Organics -----N	
4.2 Trihalomethanes -----N	
4.3 Acid and Base/Neutral Compounds -----N	
5.0 Organic Chemistry of Drinking Water (excluding measurements by GC/MS combination) -----	(-----)
5.1 Total Trihalomethanes -----N	5.5 Aromatic Volatiles -----N
5.2 Chlorinated pesticides -----N	5.6 EDB and DBCP -----N
5.3 Chlorophenoxy herbicides -----N	5.7 Polychlorinated Biphenyls -----N
5.4 Halogenated Volatiles -----N	5.8 Carbonates -----N
	5.9 Nitrogen/Phosphorus Pesticides -----N
6.0 Radiochemistry -----	(-----)
6.1 Gross alpha and beta and counting error -----N	6.7 Iodine 131 -----N
6.2 Total Radium -----N	6.8 Radioactive Strontium -----N
6.3 Radium 226 -----N	6.9 Tritium -----N
6.4 Uranium -----N	6.10 Gamma emitting isotopes -----N
6.5 Radon 222 -----N	6.11 Gross Alpha by Co-precipitation -----N
6.6 Radioactive Cesium -----N	
7.0 Shellfish Sanitation -----	(-----)
7.1 Shellfish meat Microbiology -----N	
7.2 Paralytic Shellfish Poison -----N	
8.0 Aquatic Toxicity Bioassays -----	(-----)
8.1 All Fresh Water: Static, Static/Renewal and Continuous Flow Bioassays; and Estuarine/Marine: Static, Static/Renewal, and Continuous Flow Bioassays -----N	
8.2 Hazardous wastes Section 6655 (a) (4) -----N	
9.0 Physical Properties Testing of Hazardous Waste -----	(00-04-87)
9.1 Ignitability (Flashpoint determination Section 66702) -----Y	

CHEM WASTE MANAGEMENT TE No.14156567583

Fe 4.91 17:22 No.011 P.04

FEB - 4 - 91 MON 10:07 EN800-CRL GARDENRYA P.05

FIELDS OF TESTING AND ANALYSES (continued)

Page 2

9.2	Corrosivity - pH determination	-----	Y
9.3	Corrosivity - Corrosivity towards steel (Section 88708)	-----	N
9.4	Reactivity (Section 88705)	-----	N
10.0	Inorganic Chemistry and Toxic Chemical Elements of Hazardous Waste		
10.1	Antimony	7040(09-04-90)	Y
10.2	Arsenic	-----	N
10.3	Barium	-----	N
10.4	Beryllium	-----	N
10.5	Cadmium	7130(06-02-90)	Y
10.6	Chromium, total	7190(09-04-90)	Y
10.7	Cobalt	7200(09-04-90)	Y
10.8	Copper	7210(09-04-90)	N
10.9	Lead	7420(09-04-90)	Y
10.10	Mercury	-----	N
10.11	Molybdenum	-----	N
10.12	Nickel	7520(09-04-90)	Y
10.13	Selenium	-----	N
10.14	Silver	7760(09-04-90)	Y
10.15	Thallium	7840(09-04-90)	Y
10.16	Vanadium	-----	N
10.17	Zinc	7950(06-02-90)	Y
10.18	Chromium (VI)	-----	N
10.19	Cyanide	-----	N
10.20	Fluoride	-----	N
10.21	Sulfide	-----	N
10.22	Total Organic Lead	(09-04-90)	Y
11.0	Extraction Tests of Hazardous Waste	(-----)	
11.1	Section 88700	-----	N
12.0	Organic Chemistry of Hazardous Waste (measurement by GC/MS combination)	(-----)	
12.1	Volatile compounds	-----	N
12.2	Semivolatile compounds	-----	N
13.0	Organic Chemistry of Hazardous Waste (excluding measurements by GC/MS combination)		
13.1	Halogenated Volatiles	8010(04-07-89)	Y
13.2	Non-Halogenated Volatiles	8015(06-04-87)	Y
13.3	Aromatic Volatiles	8020(06-04-87)	Y
13.4	Acrolein, Acrylonitrile, Acetonitrile	-----	N
13.5	Phenols	-----	N
13.6	Phthalate Esters	-----	N
13.7	Organochlorine Pesticides	8080(06-04-87)	Y
13.8	Polychlorinated Biphenyls (PCBs)	8080(06-04-87)	Y
13.9	Nitroaromatics and Oxalic Ketones	-----	N
13.10	Polynuclear Aromatic Hydrocarbons	-----	N
13.11	Chlorinated Hydrocarbons	-----	N
13.12	Organophosphorus Pesticides	-----	N
13.13	Chlorinated Herbicides	-----	N
13.14	Carbamates	-----	N
13.15	Total Petroleum Hydrocarbons	(11-10-88)	Y
14.0	Bulk Asbestos Analysis	(-----)	
14.1	Section 88698 (1% or greater asbestos concentrations)	-----	N
15.0	Substances Regulated Under the California Safe Drinking Water and Toxic Enforcement Act (Proposition 65) and Not Included in Other listed Groups.	-----	N

CHEM WASTE MANAGEMENT TEL Jo.14156567583

Fe 4.91 17:22 No.011 P.05

FEB - 4-91 MON 15:00 ENSECO-ORL CARDGRVPA P.06

## FIELDS OF TESTING AND ANALYSES (continued)

Page 3

16.0 Wastewater Inorganic Chemistry, Nutrients and Demand	-----	-----	-----
16.1 Acidity	-----	16.22 Oxygen, dissolved	-----
16.2 Alkalinity	-----	16.23 pH	-----
16.3 Ammonia	-----	16.24 Phenols	-----
16.4 Biochemical Oxygen Demand	-----	16.25 Phosphate, ortho	-----
16.5 Boron	-----	16.26 Phosphorus, total	-----
16.6 Bromide	-----	16.27 Potassium	-----
16.7 Calcium	-----	16.28 Residue, Total	-----
16.8 COD	-----	16.29 Residue, Filterable (TSS)	-----
16.9 Chemical Oxygen Demand	-----	16.30 Residue, Nonfilterable (TSS)	-----
16.10 Chloride	-----	16.31 Residue, Settlesable (SS)	-----
16.11 Chlorine Residual, total	-----	16.32 Residue, Volatile	-----
16.12 Cyanide	-----	16.33 Silica	-----
16.13 Cyanide amenable to Chlorination	-----	16.34 Sodium	-----
16.14 Fluoride	-----	16.35 Specific Conductance	-----
16.15 Hardness	-----	16.36 Sulfate	-----
16.16 Kjeldahl Nitrogen	-----	16.37 Sulfide (includes total and soluble)	-----
16.17 Magnesium	-----	16.38 Sulfite	-----
16.18 Nitrate	-----	16.39 Surfactants (MSAS)	-----
16.19 Nitrite	-----	16.40 Tannin and Lignin	-----
16.20 Oil and Grease	-----	16.41 Turbidity	-----
16.21 Organic Carbon	-----		

17.0 Toxic Chemical Elements in Wastewater	-----	-----	-----
17.1 Aluminum	-----	17.17 Molybdenum	-----
17.2 Antimony	-----	17.18 Nickel	-----
17.3 Arsenic	-----	17.19 Cadmium	-----
17.4 Barium	-----	17.20 Palladium	-----
17.5 Beryllium	-----	17.21 Platinum	-----
17.6 Cadmium	-----	17.22 Rhodium	-----
17.7 Chromium (VI)	-----	17.23 Ruthenium	-----
17.8 Chromium, total	-----	17.24 Selenium	-----
17.9 Cobalt	-----	17.25 Silver	-----
17.10 Copper	-----	17.26 Strontium	-----
17.11 Gold	-----	17.27 Thallium	-----
17.12 Iridium	-----	17.28 Tin	-----
17.13 Iron	-----	17.29 Titanium	-----
17.14 Lead	-----	17.30 Vanadium	-----
17.15 Manganese	-----	17.31 Zinc	-----
17.16 Mercury	-----		

18.0 Organic Chemistry of Wastewater (measurements by GC/MS combination)	-----	-----	-----
18.1 Volatile Organics	-----		
18.2 Acid and Base/Neutral compounds	-----		

19.0 Organic Chemistry of Wastewater (excluding measurements by GC/MS combination)	-----	-----	-----
19.1 Halogenated Volatiles	-----	19.8 Organochlorine Pesticides	-----
19.2 Aromatic Volatiles	-----	19.9 Polychlorinated Biphenyls	-----
19.3 Acrolein, Acrylonitrile, Acetonitrile	-----	19.10 Nitroaromatics and Cyolic Ketones	-----
19.4 Phenols	-----	19.11 Polynuclear Aromatics	-----
19.5 Benzidine	-----	19.12 Haloethers	-----
19.6 Phthalate Esters	-----	19.13 Carbonates	-----
19.7 Nitrosamines	-----		

This laboratory is also certified for additional hazardous material test categories under Certificate No. \_\_\_\_\_.

This laboratory is also certified for additional drinking water test categories under Certificate No. \_\_\_\_\_.

*Knight Piesold and Co.*  
CONSULTING ENGINEERS

**PAMELA J. STELLA**

**HYDROGEOLOGIST**

Knight Piesold and Co.  
Denver, Colorado

**EDUCATION**

M.Sc., Geological Sciences  
State University of New York at Albany

B.Sc., Geology  
State University of New York at Albany

Diploma Degree, Nursing  
Albany Medical Center School of Nursing

**MEMBERSHIP**

Geological Society of America  
American Water Resources Association  
American Geophysical Union  
American Nurses Association

**EMPLOYMENT RECORD**

1989 - Date

Knight Piesold and Co.  
Denver, Colorado

1985 - 1989

Ministry of Environment and Water Resources  
Sultanate of Oman

As acting Director of Department of Field Studies, managed the technical operations of five district offices concerned with water resource data collection through monitoring programs, water exploration programs, well permit evaluations, addressing citizen complaints relating to water rights and shortages; assisted in the planning of water development and management programs. Designed and set up operational well permitting system instituted to manage valuable groundwater resources and prevent over-exploitation, including design of a computer attachment program to facilitate processing of applications.

*Knight Piesold and Co.*  
CONSULTING ENGINEERS

1986 - 1987

**Council for the Conservation of Environment  
and Water Resources  
Sultanate of Oman**

As Senior Geologist, conducted hydrogeological investigations for drilling programs; alternative groundwater supplies for large developing sea-coast towns facing saline intrusion; aiding in water supplies to remote mountainous areas; mapping of sulfide deposits and copper mine tailings as pollutants of groundwater upstream from a large coastal town; proposing well sites to supplement traditional methods of water abstraction for villages downstream of over-developed areas; assessing availability of groundwater supplies with reference to defined agricultural areas. Additionally, technically reviewed the hydrology and geological interpretations of a comprehensive report on the origin and age of groundwater throughout Oman using methods of isotope hydrogeology.

1985 - 1986

**Public Authority for Water Resources  
Sultanate of Oman**

As Geologist on secondment for A.E.S.L. (Vancouver, Canada) was responsible for hydrogeological investigations for a sanitary landfill; production of a detailed geological map for a water management demonstration area for a small drainage basin; detailed defining (through stratigraphic measured sections) of the Tertiary aged limestones, marls and evaporites for correlation in water exploration drilling programs; and lithological logging and stratigraphic correlation of drill cutting samples with comparison to geophysical borehole logs.

1982 - 1984

**State University of New York at Albany**

**Adjunct Research Scientist for Geological Sciences  
Professor's Assistant  
Tutor for Geology and Geography for the Equal  
Opportunity Program**

1981

**N.A.S.A. and National Science Foundation Grants**

**Field Assistant**

*Knight Piesold and Co.*  
CONSULTING ENGINEERS

1977 - 1979

Albany Medical Center Hospital

Charge Nurse, Registered Nurse, Private Duty Nurse

**PUBLICATIONS**

Stella, P.J., 1987, Stratigraphy of the Tertiary Sequence in the Wadi Taww Water Management Demonstration Area, Sultanate of Oman

Stella, P.J., 1987, Geology, Hydrological Evaluation and Well Site Selections of the Fita - Sur Area for Groundwater Supply for Sur

Stella, P.J., 1987, The Semail Ophiolite Peridotite Rocks (Wadi Taww Area); Description and Secondary Permeability Properties in Relationship to Groundwater Potential.

Stella, P.J., 1987, A Review of the Wadi Dayqah Gorge, the Only Perennial Stream in Oman.

Stella, P.J., 1986, Simplified Geologic Column of the Sultanate of Oman.

Stella, P.J., 1986, Hydrogeological Reconnaissance of the Arqi Area.

Stella, P.J., Saleh bin Issa, 1986, Geological Map and Cross Sections of the Wadi Taww - Halban Water Management Demonstration Area.

Stella, P.J., 1986, Observation of Flood in Wadi Kabir, Oman's Main Commercial Center, 1st February 1986.

Stella, P.J., 1985, Geology of the Brents Cove - Tilt Cove Area, Burlington Peninsula, Newfoundland, Canada. Unpublished M.S. Thesis, State University of New York at Albany.

**5.2.6 Mark Noonan - Staff Geologist****MARK THOMAS NOONAN  
ENGINEERING GEOLOGIST/HYDROGEOLOGIST****EDUCATION**

B.S., Geology, Colorado State University, 1986

**EXPERIENCE**

1990 - Present Knight Piesold and Company, Staff Geologist

1990                   ATEC       Environmental       Consultants,       Staff  
                      Hydrogeologist, Irvine, California

- Conducted several Phase 1 and 2 ESA's
- Installed numerous groundwater monitoring wells including drilling, completing the well, and well development
- Drilled and sampled for tank pulls to assure the designation of NFA
- Sampled monitoring wells both on-site and offsite (domestic and agricultural)
- Asbestos remediation QA/QC on a National Priority site including air monitoring, soil monitoring for fiber counts, conducting field compaction tests and geologic mapping.
- Drilled 10 groundwater monitoring wells with both hollow-stem auger and triple-wall percussion drilling rigs
- Drilled two extraction wells
- Performed a soil-gas survey
- Collected numerous monitoring well water samples
- Conducted both a step-drawdown and constant-rate aquifer test including running the test with a data acquisition system, and analyzing the results with a modeling program.
- Installed dedicated submersible groundwater monitoring pumps

1989 - 1990       Pacific Soils Engineering, Engineering Geology  
                  Associate, Cypress, California

- Performed field compaction tests (certified in Nuclear Density)

- Mapped excavation cleanouts for landslide potential including:
  - faults
  - joints
  - shear zones
  - attitudes on bedding planes
  - springs or perched groundwater
- Conducted Active Fault Investigations on the San Andreas and the Cucamonga Faults. Mapped over three miles of fault trenches, created geologic maps, drew numerous cross-sections, and wrote the reports
- Conducted numerous Preliminary Geologic Reports including making the geologic maps, drilling and trenching for subsurface information, drawing the cross-sections, and writing the reports.

1988 - 1989      Geo-Tek, Staff Geologist, Rancho California, California

- Performed numerous Preliminary Geotechnical Investigations involving drilling and trenching to collect field samples and log subsurface conditions
- Ran the in-house laboratory which included:
  - shear machine
  - consolidations
  - expansion index
  - laboratory max densities
  - sand equivalents
  - concrete compressive strength
  - sieve analysis
- Performed analysis of the laboratory data including:
  - shear strength
  - bearing capacities
  - slope stabilities
  - liquefaction analysis
- Performed field compaction tests
- Performed perc tests for self-contained septic systems
- Installed groundwater monitoring wells
- Created groundwater potentiometric surface contour maps
- Wrote various reports

1986      Geotechnical Engineering Department, Colorado State University, Engineering Research Assistant,

- Assisted in installation and performance of a data acquisition system which included:
  - Installing hardware and software for an IBM PC



- Installing pressure transducers and piezometers
- Building the testing tank and research trailer
- Running various experiments and assisting in the analysis of Liquefaction potential

**CERTIFICATIONS**

40-hour OSHA health and safety training

3-hour asbestos awareness class

## **RESUME**

**MICHAEL A. CLOUD**  
6430 Apollo Place  
Windsor, California 95492  
707-838-9546

**EDUCATION:** B.A. Geology, Minor in Chemistry; June 1982, San Jose State University, San Jose, California.

**REGISTRATION:** State of California, Registered Geologist #4660.

**EXPERIENCE:** November 1989 to Present: California Regional Water Quality Control Board, North Coast Region; Santa Rosa, CA; Associate Engineering Geologist.

Prepared and managed a State contract to perform underground leaking tank site cleanups and site hydrogeologic characterizations using State Cleanup and Abatement Account Funds. Responsibilities include:

- \* Preparation of site investigation workplans per LUFT guidelines and Regional Board recommendations.
- \* Direction of contractor and subcontractor activities for leaking underground fuel tank and gasoline contaminated soil removal and drilling and well installation activities.
- \* Analysis of field data and prepare recommendations for additional required field work.
- \* Give presentations to the North Coast Regional Board on the progress and results of field work and investigations.
- \* Preparation of a final report on work performed, results of investigations, and recommendations for additional work.

July 1983 to October 1989: EMCON Associates; San Jose, California; Senior Project Geologist.

- \* Performed geologic and hydrogeologic site assessments.
- \* Prepared work proposals and cost estimates.
- \* Scheduled staff and subcontractor work and maintained project budget and objectives.

- \* Supervised office and field work of staff.
- \* Designed site ground-water monitoring systems per C.A.C., Title 23, Subchapter 15 requirements.
- \* Prepared project reports including site specific ground-water monitoring plans and Solid Waste Assessment Test (SWAT) reports.
- \* Oversaw scheduling and field operations for leaking underground fuel tank (LUFT) group of Geology Division.

**Selected Projects:**

- \* Analysis of surface geophysical survey for landfill saturation investigation.
- \* Geologic mapping of major hazardous waste disposal facility in California.
- \* Design of ground-water monitoring systems for sites underlain by anisotropic dipping aquifers.
- \* Analysis of the effect of faulting on ground-water flow in confined aquifers.

**April 1982 to July 1983: U.S. Geological Survey/Minerals Management Service, Marine Geology Branch - Data Synthesis Group; Palo Alto, CA; Physical Science Technician.**

Work consisted of compiling, editing and reviewing marine seismic data and publishing as maps and charts; drafting bathymetric and navigation maps and marine seismic profiles. Film, develop and maintain a library of off-shore seismic records on 35mm microfilm. Also, timing seismic sections and editing marine geologic reports.

**September 1978 to March 1982; Field Assistant.**

Assisted doctoral candidate with research in the field of Paleontology. Work included geologic mapping; collection and identification of marine invertebrate fossils; designing/writing computer programs for data analysis; drafting maps, tables, and illustrations for final paper.

**REFERENCES**  
**for MICHAEL A. CLOUD**

1.    **Ms. Susan Warner** **707-576-2220**  
      Regional Water Quality Control Board  
      North Coast Region  
      1440 Guerneville Road  
      Santa Rosa, California 95403
  
2.    **Stephen D. Janes, Ph.D.** **408-423-9521**  
      Meredith/Boli Associates  
      504 Pacheco Avenue  
      Santa Cruz, California 95062
  
3.    **Mr. Steve Strait** **408-453-7300**  
      EMCON Associates  
      1921 Ringwood Avenue  
      San Jose, California 95131

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET

SACRAMENTO, CA 95814

(916) 324-1814



APR 28 1989

Sheri K. Swibel  
Chemical Waste Management, Inc.  
3003 Butterfield Road  
Oak Brook, Illinois 60521

Dear Ms. Swibel:

REPORT OF VIOLATION  
DATED FEBRUARY 23, 1989

On February 23, 1989 the Department of Health Services issued a Report of Violation against the Oil and Solvent Process Company (EPA ID# CAD008302903) facility located at 1704 West First Street in Azusa, California. The violation addressed the inadequate coverage of the \$720,000 closure cost estimate.

Having received your response, dated March 27, 1989, and having confirmed the facility status with our Permit Unit, we are in agreement that your current closure cost estimate is sufficiently covered by the use of your letter of credit.

The Report of Violation, dated February 23, 1989, is hereby rescinded.

If you have any questions, please contact Richard Castle at (916) 324-2431.

Sincerely,

Rubia Bertram, Chief  
Financial Responsibility Unit

cc: Henry Chiu  
Permit Unit  
Region 3

Jerry Lile  
Surveillance and Enforcement  
Region 3

Sheri K. Swibel  
Page 2

Arnold Robbins  
U.S. EPA  
Region IX  
215 Fremont Street  
San Francisco, CA 94105

Leo Stahlecker  
Oil and Solvent Process Company  
1704 West First Street  
Azusa, CA 91702

Kenneth Amoroso  
Waste Management, Inc.  
3003 Butterfield Road  
Oak Brook, IL 60521

## DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)  
1405 N. SAN FERNANDO BOULEVARD, SUITE 300  
BURBANK, CA 91504



May 25, 1989

Mr. R. David McConnell  
Oil & Solvent Process Co.  
PO Box 907-PPP  
Azusa, CA 91702

Dear Mr. McConnell:

OPERATION PLAN COMPLETENESS DETERMINATION; OIL & SOLVENT PROCESS CO.  
EPA NO. CAD008302903

This letter supersedes the completeness determination letter dated November 29, 1988. On April 14, 1989, we received the revised Part B Application/Operation Plan (OP) prepared by Meredith/Boli & Associates, Inc. for your hazardous waste facility permit. The technical review of the revised OP has been completed, and we have determined that the plan is technically complete, with the exception of the closure costs. The closure cost estimates must be adjusted to reflect the costs associated with the rundown tanks. If revisions to the OP (with correct closure costs) are not received by the public notice date for the draft permit, permit conditions will be imposed to require additional closure costs.

If you have any questions, please contact Henry Chui at (818) 567-3141.

Sincerely,

*for John A. Hinton*  
John A. Hinton, P.E., Chief  
Facility Permitting Unit

cc: Mr. Kenneth J. O'Morrow  
Oil & Solvent Process Co.  
PO Box 907-PPP  
Azusa, CA 91702

Dr. Ronald R. Cavagrotti  
Meredith/Boli & Associates, Inc.  
6701 Center Drive West, Suite 900  
Los Angeles, CA 90045-1535

Mr. David McConnell

-2-

May 25, 1989

cc: Leo M. Stahlecker  
Oil & Solvent Process Co.  
PO Box 907-PPP  
Azusa, CA 91702

Dave Osugi (T-2-2)  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont St.  
San Francisco, CA 94105

Tom Canaday (T-2-2)  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont St.  
San Francisco, CA 94105

Jim Brietlow  
Toxics and Waste Management Division  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont St.  
San Francisco, CA 94105

Caroline Cabias  
Hazardous Waste Management Section  
Toxic Substances Control Division  
714/744 P Street  
PO Box 942732  
Sacramento, CA 94234-7320



## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814



(916) 324-2423

CERTIFIED MAIL

FEB 23 1989

Kenneth Amoroso  
Waste Management, Inc.  
3003 Butterfield Road  
Oak Brook, Illinois 60521

Dear Mr. Amoroso:

REPORT OF VIOLATION - OIL & SOLVENT PROCESS COMPANY  
EPA ID #CAD008302903

On February 9, 1989, the Department of Health Services completed a review of the financial responsibility file for the referenced facility located at 1704 West First Street, in Azusa, California.

As a result of this review, we have determined that the facility is in violation of Title 22, California Code of Regulations (CCR), section 67003 by failing to provide evidence of adequate financial assurance for the current closure cost estimate of \$720,000. Please amend Letter of Credit S-1582 or submit the following immediately:

Financial documents to satisfy the requirements of financial assurance for closure costs. The financial documents must be in the form of a trust fund, surety bond, letter of credit, closure insurance, financial test/corporate guarantee, or alternative mechanism. The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

If you have any questions regarding this Report of Violation, please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

Caroline Cabias, Chief  
Hazardous Waste Management Section  
Toxic Substances Control Division

Enclosures

cc: (see next page)

Kenneth Amoroso  
Page 2

cc: Henry Chiu  
Permitting Unit  
Region 3

Jerry Lile  
Surveillance and Enforcement  
Region 3

Arnold Robbins  
EPA - Region IX

Sherry K. Swibel  
Oil & Solvent Process Company  
1704 West First Street  
Azusa, California 91702

✓ Leo Stahlecker  
Oil & Solvent Process Company  
1704 West First Street  
Azusa, California 91702

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7011  
LOS ANGELES, CA 90012  
(213) 620-2380



June 29, 1988

Mr. R. David McConnell  
Oil & Solvent Process Company  
P.O. Box 907-PP  
Azusa CA. 91702

Dear Mr. McConnell:

COMPLETENESS DETERMINATION, ACCEPTANCE OF APPLICATION FOR FILING,  
Oil & Solvent Process Company, EPA NO. CAD008302903

This Department has conducted an initial completeness review of your application and determined the application to be complete enough for filing. The Department will now begin its comprehensive technical review of both the application and associated facility operation. State law allows the Department up to one year from the date of this letter to complete its processing of the application and make a final permit determination. During the technical review period, the Department will likely notify you of additional deficiencies in the application or facility operation. You will be required to correct these deficiencies prior to the Department's final permit decision.

If you have any questions about this completeness determination, please telephone Henry Chui at (213)620-6183.

Sincerely,

*for John A. Hinton*

John A. Hinton, P.E., Chief  
Facility Permitting Unit  
Region 3 (Los Angeles)  
Toxic Substances Control Division

cc: Mr. Kenneth J. O'Morrow, OSCO  
Mr. Leo M. Stahlecker, OSCO

Dr. Ronald R. Cavagrotti  
Senior Scientist  
Meredith/Boli & Associates, Inc.  
6701 Center Drive West, Suite 900  
Los Angeles, Ca. 90045-1535

cc: Dave Osugi  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont St.  
San Francisco, Ca. 94105

Paula Bisson  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont St.  
San Francisco, Ca. 94105

Hank H. Yacoub  
Supervising Water Resource  
Control Engineer  
CRWQCB LA Region  
107 South Broadway, Suite 4027  
Los Angeles, Ca. 90012-4596

**DEPARTMENT OF HEALTH SERVICES**

107 SOUTH BROADWAY, ROOM 7011  
LOS ANGELES, CA 90012  
(213) 620-2380



May 3, 1988

Mr. Kenneth O'Morrow  
Director of Environmental and  
Technical Affairs  
Oil and Solvent Process Company (OSCO)  
1704 W. 1st Street  
Azusa, CA 91702

Dear Mr. O'Morrow:

**REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE**

On March 23 and 24, 1988, Jerry Lile and David Schwartzbart, representing this Department, inspected your facility, EPA number CAD008302903, located at 1704 W. 1st Street, Azusa, California 91702.

As a result of that inspection, violations of hazardous waste statutes and regulations were identified.

The specified violations and required corrective action are listed below. Failure to correct the identified violation(s) within the schedule provided will result in DHS citing you for continuing/additional violations.

**I. Report of Violations**

COUNT 1: Section 67105 (c), California Code of regulations

OSCO's records indicated that no annual training update had been provided for employees prior to approximately 1 1/2 years ago.

COUNT 2: Section 66374 (1), (1), California Code of regulations

OSCO has installed a new mixing tank (# 105) and replaced another mixing tank (#104) without notifying the Department.

**II. Schedule for Compliance**

Correct violation(s) upon receipt of this Report.

Please submit written verification to this office by May 31, 1988 that the above violation(s) have been corrected.

The Department will conduct a reinspection of Oil and Solvent Process Company to verify compliance.

The issuance of this report of Violation and Schedule for Compliance does not preclude DHS from taking administrative, civil, or criminal action as a result of the violations noted herein.


Mr. Kenneth O'Morrow

-2-

May 3, 1988

If you have any questions regarding this Report, please contact Jerry Lile of this Office.

Sincerely,



Dave Chase, Program Supervisor  
Surveillance and Enforcement Unit  
Southern California Section  
Toxic Substances Control Division

DC:JL:mf

cc: Bill Soo Hoo  
Enforcement Coordinator  
Office of Legal Services  
714/744 "P" Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Larry Matz  
Surveillance and Enforcement  
Toxic Substances Control Division  
714/744 "P" Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Rubia Bertram  
Financial Responsibility Unit  
Toxic Substances Control Division  
714/744 "P" Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Anastacio Medina  
Los Angeles County Health  
2615 S. Grand Avenue, 6th Floor  
Los Angeles, CA 90007

Karen Schwinn  
Waste Compliance Branch  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont Street, T-2  
San Francisco, CA 94105

Certified Mail  
(RRR)  
#P699125254

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY 7011  
LOS ANGELES, CALIFORNIA 90012  
(213) 620-2380



March 8, 1988

Mr. R. David McConnell  
Oil & Solvent Process Company  
1704 West First Street  
Azusa, CA 91702

Dear Mr. McConnell:

## EXTENSION REQUEST FOR SUBMITTAL OF HAZARDOUS WASTE FACILITY PERMIT RENEWAL APPLICATION (CAD008302903)

Pursuant to section 66388(c), Title 22, Division 4, Chapter 30 of the California Code of Regulations (CCR), a new application for a Hazardous Waste Facility Permit must be submitted to the Department at least 180 days before the expiration date of the existing permit unless permission for a later date has been granted by the Department. Your request for an extension dated January 25, 1988, is hereby granted. The complete permit renewal application must be submitted to this office by March 31, 1988.

Please be advised that:

1. The Department will not accept Hazardous Waste Facility Permit Renewal applications submitted after the expiration date of the existing permit.
2. The Department will not begin processing renewal applications until the applicant has fully complied with all the renewal requirements.
3. The completeness of any application for a Hazardous Waste Facility Permit Renewal will be judged independently of any other permit application of permit activity.
4. Section 25199.7 (a) of the Health and Safety Code, Division 20, requires that if a Hazardous Waste Facility Project requires a land use decision by a local agency, the proponent shall file a notice of intent to apply for a land use decision with the Office of Permit Assistance in the Office of Planning and Research (Governor's Office).

Failure to comply with requirements outlined above may result in the expiration of your existing permit. If you have any questions, please contact Charles Humphrey at (213) 620-2380.

Sincerely,

John A. Hinton, P.E., Chief  
Facility Permitting Unit  
Southern California Section  
Toxic Substances Control Division

JAH:CH:ma

Mr. R. David McMcConnell

-2-

March 8, 1988

cc: Dave Osugi  
U. S. Environmental Protection  
Agency, Region IX  
215 Fremont Street  
San Francisco, CA 94105

Caroline Cabis, Chief  
Hazardous Waste Management Section  
Toxic Substances Control Division  
714/744 P Street  
P.O. Box 942732  
Sacramento, CA 94234-7320